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west virginia department of environmental protection

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Earl Ray Tomblin, Governor  
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**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** June 18, 2015  
**Subject:** SWN Production Company, LLC – John Hupp Well Pad – Brooke County, WV  
**ID #:** 009-00104  
**APP #:** R13-2980E

**BACKGROUND INFORMATION:**

On March 30, 2015 the DAQ received a Class I Administrative Update request from SWN Production Company, LLC to make changes to Permit R13-2980D by replacing the existing 30.0 MMBTU/hr combustor (APC-COMB-TKLD) with one (1) 8.0 MMBTU/hr combustor (APC-COMB-TKLD-1) along with reducing the three existing vapor combustor pilots (EU-PILOTS) at 150 scf/hr total down to one vapor combustor pilot (EU-PILOT) at 50 scf/hr. This update is reflected in sections 1.0 and 9.0 of Permit R13-2980E. This replacement results in a decrease in emissions as shown below:

<u>Pollutant</u>	<u>Hourly PTE</u>	<u>Yearly PTE</u>
NO <sub>x</sub>	(-3.04)	(-13.59)
CO	(-6.07)	(-26.57)
VOC	no change	no change
PM <sub>10</sub>	(-0.07)	(-0.29)

**RECOMMENDATION:**

Based on 45CSR13 “Class I Administrative Updates” are limited to changes including a change in a permit condition as necessary to allow changes in operating parameters, emission points, control equipment or any other aspect of a source which results in a decrease in the emission of any existing regulated air pollutant, which is what is occurring in this permit registration. Therefore, a Class I Administrative Update is recommended for the above mentioned combustor replacement.

William T. Rothwell II, P.E.  
Engineer

6/18/2015

Date